



Andrea Ferster <andreaferster@gmail.com>

RE: Skinners Falls Bridge - FRCP 65(b) Notice of Intent to Request Temporary Restraining Order

1 message

Brofee, Neal <nbrofee@pa.gov>

Mon, Apr 7, 2025 at 5:53 PM

To: Lauren Williams <lmw@greenworkslawconsulting.com>

Cc: Andrea Ferster <andreaferster@gmail.com>, Michael Fiorentino <mdfiorentino@gmail.com>, "Gardner, Kenda Jo" <KEGARDNER@pa.gov>, "Baccus, Nathan (FHWA)" <nathan.baccus@dot.gov>, "info@attorneygeneral.gov" <info@attorneygeneral.gov>, "Powell, Vanessa (FHWA)" <Vanessa.Powell@dot.gov>, "Kovatis, Stephen (GC)" <skovatis@pa.gov>

Good evening, Lauren.

PennDOT opposes (i.e., does not concur in) the motion for a temporary restraining order.

The bridge demolition remains scheduled for April 10 with demolition preparation today (April 7), tomorrow (April 8) and Wednesday (April 9).

PennDOT and Pennsylvania Secretary of Transportation Michael B. Carroll consent to service by email. This is not consent to service by email for Governor Shapiro.

I am available to participate in a hearing on the TRO request tomorrow, Wednesday or Thursday. If the hearing is remote, I can participate any time. If the hearing is in person, I will need travel time depending on the location.

**Neal T. Brofee** | Environmental Counsel

Governor's Office of General Counsel

Department of Transportation | Office of Chief Counsel

Department of Transportation | Office of Chief Counsel

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From: Lauren Williams <lmw@greenworkslawconsulting.com>**Sent:** Monday, April 7, 2025 3:20 PM

To: Brofee, Neal <nbrofee@pa.gov>; Gardner, Kenda Jo <KEGARDNER@pa.gov>; Baccus, Nathan (FHWA) <nathan.baccus@dot.gov>; Powell, Vanessa (FHWA) <Vanessa.Powell@dot.gov>; info@attorneygeneral.gov; Kovatis, Stephen (GC) <skovatis@pa.gov>
Cc: Andrea Ferster <andreaferster@gmail.com>; Michael Fiorentino <mdfiorentino@gmail.com>
Subject: [External] Skinners Falls Bridge - FRCP 65(b) Notice of Intent to Request Temporary Restraining Order
Importance: High

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Dear Counsel,

Please be advised that Damascus Citizens for Sustainability, Inc. intends to file a complaint. Named in the complaint will be U.S. DOT Secretary Duffy, PennDOT Secretary Carroll, FHWA Division Administrator Nolan and FHWA Acting Administrator White, and PA Governor Shapiro.

Pursuant to FRCP Rule 65(b), we are providing you with notice of our intent to request a temporary restraining order (TRO) to restrain the planned demolition of the Skinner Falls Bridge. Pursuant to Local Rule 7.1, we are requesting that you advise us as to whether you concur in the TRO motion.

We have been given to believe that demolition of the Skinner Falls Bridge could occur as early as Thursday, April 10, 2025. As a result, we believe that we need to request a TRO no later than tomorrow, April 8th, and seek an order from the Court *ex parte* if necessary. **Please advise us immediately** if in fact demolition of the Bridge will be taking place at a later date, and what that later date will be, to the best of your knowledge, so that the TRO request may be heard without undue inconvenience to the Court.

Finally, please advise us on whether you would consent to service on your respective clients by email to you and/or to other counsel that you identify.

I am copying DCS's litigation counsel (Andrea Ferster and Michael Fiorentino) on this email. Please ensure they are included on your responses, and future communications should always address them, and CC me.

Thank you,

Lauren Williams

Lauren M. Williams, Esq.

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Pronouns: she/her/they/them

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